

## **REMARKS**

### **Rejection under 35 U.S.C. § 103(a)**

Currently pending are device claims 1, 4 and 5 and method claim are 6. The device claims all provide for a storage device that includes a user interface means for allowing EPG (electronic program guide) information to be used and searched, metadata processing means for processing received XML (Extensible Markup Language)-formatted EPG information, storing the processed EPG information in a storage medium, and parsing the stored EPG information, searching means for searching the stored EPG information using at least one of a title, a keyword or a genre according to a user's request and providing the searched information to a user through the user interface means, and controlling means for controlling the processing, storage and searching of the received and parsed EPG information, wherein the metadata processing means uses a data management system API to store the processed EPG information in the storage medium and wherein the metadata processing means further comprises preference extracting means for extracting a preference that is either directly input by a user or automatically created from a watch record based upon specific digital broadcasts previously accessed by the user. The corresponding method claim recites receiving XML (Extensible Markup Language)-based EPG (electronic program guide) information, extracting metadata from the received XML-based EPG information, processing the extracted metadata, storing the processed metadata using a database management system API, and parsing the stored metadata, searching the stored metadata using at least one of a title, a keyword or a genre in response to a the user's request to provide the EPG information, the search being performed according to a user preference that is either directly input by the user or automatically created from a watch record based upon specific digital broadcasts previously accessed by the user; and displaying the searched EPG information to be displayed to the user using an interface API.

The Examiner rejected all the pending claims as obvious under 35 U.S.C. 103(a) in light of a combination of U.S. Pat. Appl. Publ. No. 2002/0166123 ("Schrader *et al.*"), U.S. Pat. Appl. Publ. No. 2001/0013123 ("Freeman *et al.* ") and U.S. Patent No. 6,163,316 ("Killian"). Reconsideration is respectfully requested. Nothing in the proposed combination would have suggested a storage device or corresponding method that, *inter alia*, provides for processing

received XML (Extensible Markup Language)-formatted EPG information or metadata extracted from the received XML (Extensible Markup Language)-formatted EPG information and storing the processed EPG information or extracted metadata in a storage medium using a data management system API.

Killian relates to an electronic programming system and method that includes a JAVA-enabled television receiver 10 having a JAVA-based platform 12. (Col. 3, lines 7- 13.) Killian teaches that:

“An electronic programming guide (EPG) JAVA applet or application running on platform 12 periodically accesses database 48 using link 14 and server 46 to receive program listing information 6 that allows the EPG applet or application to provide television-related functionalities to viewers associated with receiver 10 and television 40, as discussed more fully below with reference to FIG. 3. Although database 48 is discussed, the present invention contemplates a suitable database integral to receiver 10 and periodically updated by one or more service providers external to receiver 10 using link 14, for example, daily, weekly, or on any other periodic basis, to include program listing information 6 accessible to platform 12”

(Col. 4, lines 7-19)

Accordingly, Killian merely suggests accessing database 48 with an electronic programming guide (EPG) JAVA applet or application. It does not disclose or suggest storing processed EPG information or extracted metadata in a storage medium using a data management system API

Fig. 2 of Killian illustrates the system's operating hierarchy. Killian explains:

“Fourth level 57 includes a JAVA toolkit 58 having a collection of APIs 60 that cooperate with JAVA operating system 56 to allow JAVA applets 64 and applications 62 in fifth level 59 to perform functionalities associated with JAVA applets 64 and applications 62. In one embodiment, APIs 60 of toolkit 58 allow

platform 12 to support JAVA applets 64 downloaded from the Internet over link 14, JAVA applications 62 installed locally on receiver 10 or any processing platform associated with receiver 10, or any other appropriate JAVA program that uses the television-related functionalities of APIs 60.”

(Col. 6, lines 32-35.)

Tool kit 58 is further discussed at col. 7, lines 49-58. Killian explains”

“Toolkit 58 also includes an electronic programming guide (EPG) API 60 that contains classes for querying for, retrieving, and manipulating program listing information 6 contained in program listing database 48, constructing and modifying viewer profiles according to viewer preferences, constructing electronic scheduling displays according to viewer profiles and selected program listing information 6, and providing other desirable functionalities that allow viewers to more intelligently select, schedule, and record viewing opportunities.”

It can be seen that Killian teaches only using API’s to cooperate with JAVA applets and applications to query, retrieve and manipulate programming. Consequently, Applicant respectfully disagrees with the Examiner’s assertion that, “API 60 is used for manipulating data contained in database 48, col. 7 lines 49-58. Therefore EPG API is clearly used to store EPG data in the database.” (Page 2.) On the contrary, Applicant respectfully submits that the use of API 60 to manipulate, information (as opposed, for example, to query information or to retrieve information) does not suggest using a data management system API to store processed metadata in a storage medium.

Furthermore, the Examiner acknowledges that, “However, Schrader combined with Freeman does not explicitly teach . . . storing processed EPG information and searched information using a database management API.” (Page 5.) Therefore, nothing in Schrader *et al* and/or Freeman *et al* makes up for the deficiencies in the teaching of Killian. Nothing in the proposed combination would have suggested a storage device or corresponding method that provides for processing EPG information or extracted metadata and storing the processed EPG

information or extracted metadata in a storage medium using a data management system API. Therefore, the rejection of claims 1 and 4-6, all the pending claims, as obvious under 35 U.S.C. 103(a) in light of a combination of Schrader *et al*, Freeman *et al* and Killian should be withdrawn.

**Conclusion**

Applicant respectfully submits that in light of the foregoing amendments and remarks, claims 1 and 4-6 are in condition for allowance, so that a prompt and favorable action is earnestly solicited.

Respectfully submitted,  
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